

\*PHILIP MORRIS' RESPONSES TO PLAINTIFFS'  
INTERROGATORIES NOS. 1 AND 7-27\*

CASE: Carlisle

STATE: TX (Travis County)

DATE: 24-OCT-86

QUESTION # 14

Q: Please identify, by scientific name, generic name, and chemical formula, all additives, chemical or otherwise, in each of your tobacco products, papers, and filters, and: (a) state whether or not each additive or material has ever been determined or suspected to be carcinogenic, cocarcinogenic, a tumor initiator, or to yield nitrosamines; (b) identify tests, analyses, or research you have conducted, or had conducted on your behalf, to determine the properties and/or health hazards of each additive or material.

A: OBJECTIONS TO ITEM 14 Philip Morris hereby incorporates by reference its objections (1) - (3) to Item 1 as objections to Item 14 as if fully restated here. Philip Morris also objects to Item 14 on the ground that it requests information beyond the scope of this suit. Plaintiff Weldon Carlisle has testified in his deposition that the only Philip Morris product which he smoked was Benson and Hedges from 1968 until 1984. Philip Morris objects to the production of information on "each of [its] tobacco products" without regard to whether or not Mr. Carlisle smoked that Product. Philip Morris also objects to providing the information which the plaintiffs request for times outside the interval during which Mr. Carlisle smoked Benson and Hedges. Such information is not relevant to Mr. Carlisle's claims in this suit nor is it reasonably calculated to lead to the discovery of admissible evidence. In addition, Philip Morris objects to this interrogatory on the grounds that it calls for the disclosure of highly confidential and sensitive trade secret information, and that such disclosure would result in irreparable harm and competitive injury to Philip Morris. Subject to and without waiver of the foregoing objections, Philip Morris will produce, subject to the entry of an appropriate protective order, a list of smoke constituents which contains those constituents found in Benson and Hedges cigarette smoke from 1968 through 1984. This list will include the pyrolytic products of the tobacco leaf and additives. Philip Morris does not represent that this list includes every constituent of cigarette smoke for some are in such minute quantities that they cannot be measured by present analytical methods. Cigarettes contain a combination of the following basic types of tobacco: flue-cured, burley, Maryland and Turkish. Additives to tobacco include humectants, casing materials and flavorants. Humectants are used to keep moisture in the tobacco, casing materials are used to achieve flavor and to improve tobacco processing while flavorants are used in minute quantities to give each brand its unique taste.

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